Honorable Marc L. Barreca
Chapter 7
Hearing Date: July 8, 2011
Hearing Time: 9:30 a.m.
Response Date: July 1, 2011

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In Re: ADAM R. GROSSMAN, Debtor.	Case No. 10-19817 OBJECTION OF UNITED STATES TRUSTEE TO DEBTOR'S MOTION TO CONVERT TO CHAPTER 13

The United States Trustee hereby objects to the motion by Adam R. Grossman (the "Debtor") to convert the above-captioned chapter 7 case to a case under chapter 13 (the "Motion"). In support of the objection, the United States Trustee respectfully states as follows:

The United States Trustee is investigating the Debtor's financial circumstances, including, but not limited to, his admitted transfer of substantially all of his assets without Court authority – right before the chapter 11 trustee was appointed in his initial chapter 11 case. In furtherance of the investigation, the United States Trustee has a B.R. 2004 examination of the Debtor scheduled for August 11, 2011.

As set forth in his declaration in support of the Motion, the Debtor is a well-educated and sophisticated business person. He says that he wants to convert to chapter 13 in order to pay his creditors through a 100% plan. The United States Trustee is all for 100% payment to creditors. However, at this point it looks like the Debtor transferred property of the estate to hinder, delay, or defraud his creditors and that now he is seeking to convert to chapter 13 in bad faith to avoid

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the continued scrutiny of the chapter 7 trustee and the United States Trustee – and the very real possibility of an objection to his discharge.

The United States Trustee requests that the Motion be denied.

DATED this 29th day of June, 2011.

Respectfully submitted,

ROBERT D. MILLER JR
United States Trustee

/s/ Martin L. Smith
Martin L. Smith, WSBA #24861
Attorney for United States Trustee

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